

January 12, 2017

California Air Resource Board

1001 I Street

Sacramento, CA 95814

By email: mary.nichols@arb.ca.gov, richard.corey@arb.ca.gov

Re: EJAC Timeline for the 2030 Target Scoping Plan

Chair Mary Nichols and Richard Corey:

The AB 32 Environmental Justice Advisory Committee (“EJAC”) writes to express grave concern for the unmanageable timeline and inadequate public process in the development of the 2030 Target Scoping Plan.

The EJAC is a legislatively mandated committee tasked with advising the Air Resources Board (“ARB”) on its development of the Scoping Plan and the state’s implementation of AB 32. We represent environmental justice communities throughout California. Our insights and input ensures that addressing climate change in California uplifts the communities historically burdened by pollution and does not result in an inequitable distribution of burdens and benefits. Our priorities include maximizing direct pollution reduction within environmental justice communities, growing meaningful climate partnerships between the state and communities, promoting economic and health equity, and increasing access to clean energy technologies, jobs and economic opportunities within disadvantaged communities.

The EJAC started meetings to discuss the 2030 Target Scoping Plan in December 2015. In addition to committee meetings across the state, the EJAC hosted a robust community engagement process in July of 2016, conducting 9 community meetings and collecting over 700 individual comments. To fully incorporate community input and EJAC analysis, it is critical that ARB allow for a truly accessible public process.

We are concerned that key data and research for the 2030 Target Scoping Plan will not be made available to us and the public in time to allow for meaningful review, briefings, and amendments to the EJAC Recommendations. Most notably:

- OEHHA report on the impact of Cap-and-Trade on environmental justice communities
- Completed studies of the three Scoping Plan Scenarios (including carbon tax), the economic scenarios, the Natural and Working Lands emissions quantification methodology, and any new scenarios staff is expecting will be included in the Final Plan
- Completed and updated ARB staff preparation of the cross-link table indicating EJAC Recommendations included in the Scoping Plan, and explanations if excluded
- AB 197 analysis of Scoping Plan measures related to GHG emissions and co-pollutants, and avoided social costs of carbon
- The complete Adaptive Management Plan with actions currently in development by staff

We therefore request that ARB delay the final draft of the Scoping Plan and the beginning of the CEQA process for at least 6 weeks after release of the above-mentioned studies and reports. The EJAC will need at least two weeks to review and analyze these documents, a publicly noticed meeting to discuss with staff, another 4 weeks for additional community workshops, and a final publicly noticed meeting to produce recommendations to inform the CEQA process and development of the final Scoping Plan. We also request that the EJAC have full ARB staff support to conduct community workshops in February 2017.

Finally, we are deeply concerned by the delay and failure to date of the Adaptive Management Plan to provide essential protections for environmental justice communities from increased negative health impacts resulting from ARB's Cap-and-Trade system. We need to see the ARB present specific actions for correcting this problem.

Thank you for your attention in this matter and we look forward to your reply before the January 18, 2017 EJAC meeting.

Sincerely,

Katie Valenzuela Garcia
Sekita Grant
Mari Rose Taruc
On behalf of the EJAC

Cc: Diane Takvorian, Dean Florez, Floyd Vergara and Trish Johnson, ARB
Saul Gomez and Camille Wagner, Governor Brown's Office
Arsenio Mataka, CalEPA
John Faust, OEHHA